

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT NEW YORK

ROBERT BROWN and THE ESTATE OF :
BOBBI KRISTINA BROWN :
Plaintiffs, :
v. :
SHOWTIME NETWORKS, INC., BRITISH :
BROADCASTING CORPORATION, PASSION :
PICTURES CORP. TRACEY BAKER- :
SIMMONS, WANDA SHELLEY, B2 :
ENTERTAINMENT, LLC, and SIMMONS :
SHELLEY ENTERTAINMENT, LLC :
Defendants. :
X

Case No.: 1:18-cv- 011078-CM

ECF Case

SUPPLEMENTAL DECLARATION OF CLIVE ILLENDEN

I, CLIVE ILLENDEN, declare under 28 U.S.C. § 1746, as follows:

1. I am commercial and business affairs manager for defendant British Broadcasting Corporation (“BBC”) and have worked for BBC since 2006. I am familiar with the facts herein and make this declaration from my own personal knowledge.
2. BBC America is a television channel that is jointly owned by BBC Studios and AMC Networks. As I previously testified, BBC Studios is a commercial subsidiary of BBC, and it was not involved in the production or distribution of the documentary *Whitney. “Can I Be Me.”*
3. BBC World News is a television channel that is owned and operated by BBC Global News Ltd, a commercial subsidiary of BBC. BBC Global News Ltd was not involved in the production or distribution of the documentary *Whitney. “Can I Be Me.”*

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 14 day of May 2019.



Clive Illenden